

UNITED STATES DISTRICT COURT
District of Minnesota

UNITED STATES OF AMERICA,

INDICTMENT *CR 14-358 DSD/JJK*

Plaintiff,

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

v.

ROXANNE MERRELL,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Production of Child Pornography)

On or about May 20, 2010, in the State and District of Minnesota, the defendant,

ROXANNE MERRELL,

did employ, use, persuade, induce, entice, and coerce a known minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely a file titled Imagejpeg_2-4, and the visual depiction was transported using any means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 2

(Production of Child Pornography)

On or about May 20, 2010, in the State and District of Minnesota, the defendant,

ROXANNE MERRELL,

SCANNED

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did employ, use, persuade, induce, entice, and coerce a known minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely a file titled Imagejpeg_2-5, and the visual depiction was transported using any means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

FORFEITURE ALLEGATIONS

Counts 1-2 of this Indictment are hereby realleged and incorporated, as if fully set forth by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

- (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title

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21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON